

**IN THE UNITED STATE DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN MOTORISTS INSURANCE
COMPANY (as successor by merger of
AMERICAN PROTECTION INSURANCE
COMPANY) and LUMBERMENS
MUTUAL CASUALTY COMPANY,

Plaintiffs,

v.

MTS INSURANCE SERVICES, LLC
and AMWINS GROUP, INC. (as successor
by merger of MTS INSURANCE
SERVICES, LLC),

Defendants.

Civil Action No. 1:08-cv-3320

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Samuel J. Thomas, a member in good
standing of the Bar of this Court, hereby move for an Order allowing the admission pro hac vice
of:

Applicant's Name: Christopher J. Dos Santos
Firm Name: Bressler, Amery & Ross, P.C.
Address: 325 Columbia Turnpike
City/State/Zip: Florham Park, New Jersey 07932
Phone Number: (973) 514-1200
Fax Number: (973) 514-1660

Christopher J. Dos Santos is a member in good standing of the Bar of the States of
Pennsylvania and New Jersey.

There are no pending disciplinary proceeding against Christopher J. Dos Santos in any State of Federal Court.

Dated: May 5, 2008
Florham Park, New Jersey

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. J. Thomas', is written over a horizontal line.

Samuel J. Thomas, Esq.
SDNY Bar No. ST9959
Bressler, Amery & Ross, P.C.
325 Columbia Turnpike
Florham Park, New Jersey 07932
Phone Number: (973) 514-1200
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**AFFIDAVIT OF SAMUEL J. THOMAS, ESQ.
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of New Jersey)
)
County of Morris) ss:

SAMUEL J. THOMAS, ESQ., being duly sworn, hereby deposes and says as follows:

1. I am a partner at Bressler, Amery & Ross, P.C., counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' Motion to Admit Christopher J. Dos Santos as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in November 30, 1999. I was also admitted to the Bar of the United States District Court for the Southern District of New York on January 7, 2000, and am in good standing with this Court.

3. I have known Christopher J. Dos Santos since 2007.
4. Mr. Dos Santos is an associate at Bressler, Amery & Ross, P.C.
5. I have found Mr. Dos Santos to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move the admission of Christopher J. Dos Santos, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Christopher J. Dos Santos, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Christopher J. Dos Santos, pro hac vice, to represent Plaintiffs in the above captioned action be granted.


Dated: May 5, 2008
Florham Park, New Jersey

Respectfully submitted,



Samuel J. Thomas, Esq.
SDNY Bar No. ST9959
Bressler, Amery & Ross, P.C.
325 Columbia Turnpike
Florham Park, New Jersey 07932
Phone Number: (973) 514-1200
Fax Number: (973) 514-1660

Sworn to and subscribed before me
this 5th day of May, 2008


Notary Public

MELISSA MORALES
A Notary Public of New Jersey
My Commission Expires June 4, 2012



Supreme Court of Pennsylvania

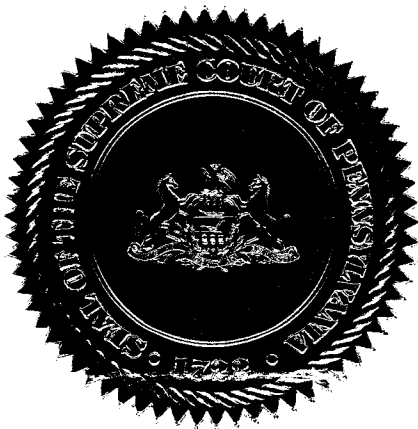
CERTIFICATE OF GOOD STANDING

Christopher John Dos Santos, Esq.

DATE OF ADMISSION

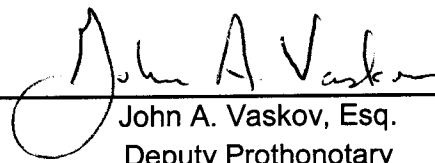
October 29, 2007

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 10, 2008


John A. Vaskov, Esq.
Deputy Prothonotary

Supreme Court of New Jersey

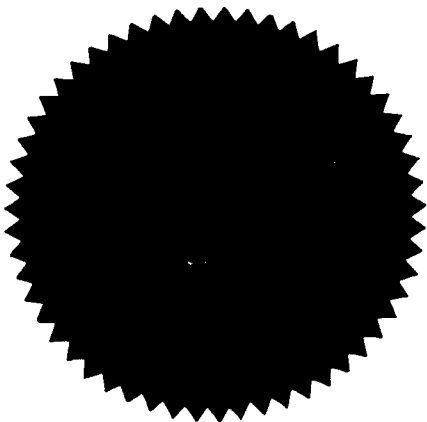


Certificate of Good Standing

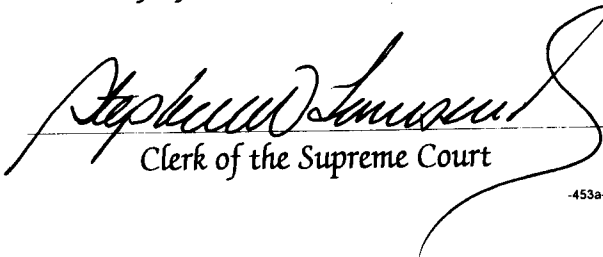
This is to certify that **CHRISTOPHER J DOS SANTOS**
(No. **015362007**) was constituted and appointed an Attorney at Law of New
Jersey on **December 04, 2007** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
11TH day of April, 20 08


Clerk of the Supreme Court

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Admit Counsel Pro Hac Vice along with the Affidavit of Samuel J. Thomas, Esq. in Support thereof has been furnished on this 6th day of May, 2008 by U.S. mail to attorney of record for Defendants:

Helen Gavaris, Esq.
Loeb & Loeb, LLP
345 Park Avenue
New York, New York 10154-1895



Samuel J. Thomas
SDNY Bar No. ~~ST~~9959
Bressler, Amery & Ross, P.C.
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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the Motion of Samuel J. Thomas, attorney for Plaintiffs American Motorists Insurance Company (as successor by merger of American Protection Insurance Company) and Lumbermens Mutual Casualty Company, and said sponsor attorney's Affidavit in Support;

IT IS HEREBY ORDERED that

Applicant's Name:	<u>Christopher J. Dos Santos</u>
Firm Name:	<u>Bressler, Amery & Ross, P.C.</u>
Address:	<u>325 Columbia Turnpike</u>
City/State/Zip:	<u>Florham Park, New Jersey 07932</u>
Phone Number:	<u>(973) 514-1200</u>
Fax Number:	<u>(973) 514-1660</u>
E-mail Address:	<u>cdossantos@bressler.com</u>

is admitted to practice pro hac vice as counsel for Plaintiffs American Motorists Insurance Company (as successor by merger of American Protection Insurance Company) and

Lumbermens Mutual Casualty Company in the above captioned action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____
New York, New York

United States District/Magistrate Judge